

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

FRED WATSON,)
)
Plaintiffs,)
)
v.) Case No. 4:17-cv-2187
)
CITY OF FERGUSON, MISSOURI, et al.)
)
Defendants.)

**DEFENDANTS' CONSENT MOTION FOR LEAVE TO FILE
DEFENDANTS' REPLY IN SUPPORT OF THEIR JOINT MOTION FOR SUMMARY
JUDGMENT IN EXCESS OF FIFTEEN PAGES**

COME NOW Defendant City of Ferguson and Defendant Eddie Boyd (collectively, "Defendants"), by and through their undersigned counsel, and with the consent of Plaintiff, hereby seek leave to file Defendants' Reply in Support of their Joint Motion for Summary Judgment in excess of the Court's 15-page limit for motion briefs, up to a maximum of twenty-five (25) pages. In support of this Motion, Defendants state as follows:

1. On November 22, 2021, Defendants filed their Memorandum in Support of their Joint Motion for Summary Judgment, which was thirty (30) pages long. (Doc.#: 186).
2. On January 21, 2022, Plaintiff filed his Response to Defendants' Motion for Summary Judgment, which was forty-five (45) pages long, as well as his Statement of Additional Material Facts that spanned three hundred and twenty-nine paragraphs (329) and forty-one (41) pages.
3. In order to properly reply to Plaintiff's Response, Defendants request leave to file Defendants' Reply in Support of their Motion for Summary Judgment in excess of this Court's fifteen (15) page limit, up to and including thirty-five (25) pages.

4. The additional pages are necessary because Defendants filed a joint motion addressing Plaintiff's claims against both the parties, the breadth of arguments raised by Plaintiff in his Response to Defendants' Motion for Summary Judgment, as well as the complexity of the issues before this Court.

5. Counsel for Plaintiff has consented to this request.

WHEREFORE, Defendants respectfully request that the Court grant them leave to file a Reply in Support of their Joint Motion for Summary Judgment in excess of fifteen (15) pages, not to exceed twenty-five (25) pages, and for such other and further relief as the Court deems appropriate.

LEWIS RICE LLC

By: /s/ Jacqueline K. Graves

Ronald A. Norwood, #33841MO
Aarnarian D. Carey, #58286MO
Jacqueline K. Graves, #64875MO
600 Washington Ave., Suite 2500
St. Louis, Missouri 63101
(314) 444-7759 (Telephone)
(314) 612-7759 (Facsimile)
rnorwood@lewisrice.com
acarey@lewisrice.com
jgraves@lewisrice.com

Attorneys for Defendant City of Ferguson

REEVES LAW LLC

By: /s/ John M. Reeves

John M. Reeves, #59634MO
7733 Forsyth Blvd.,
Suite 1100--#1192
St. Louis, MO 63105
314-775-6985
reeves@reeveslawstl.com

Attorney for Defendant Eddie Boyd, III

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 15th day of February, 2022, a true copy hereof was electronically filed with the Clerk of the Court using the CM/ECF system, to be served by operation of the Court's electronic filing system on all counsel of record.

/s/ Jacqueline K. Graves